

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
Case No.: 2:25-cv-00020-TBM-RPM

SOUTHERN DISTRICT OF MISSISSIPPI
FILED

JUN 26 2025

ARTHUR JOHNSTON
BY DEPUTY

Michelle Brown,
Plaintiff,

v.

Professional Security Corporation,
Defendant.

PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT

COMES NOW the Plaintiff, **Michelle Brown**, appearing *in propria persona*, and respectfully moves this Honorable Court, pursuant to **Federal Rule of Civil Procedure 55(a)** and applicable local rules of the United States District Court for the Southern District of Mississippi, for entry of default against Defendant **Professional Security Corporation**.

In support of this motion, Plaintiff states as follows:

1. On **February 14, 2025**, Plaintiff filed a Complaint in this Court against Defendant **Professional Security Corporation**, alleging violations of Title VII of the Civil Rights Act, 42 U.S.C. § 1981, Mississippi state laws, and other constitutional and statutory claims.
2. A copy of the Summons and Complaint was properly served on the Defendant by the U.S. Marshal on **June 4, 2025**, as evidenced by the filed proof of service.
3. Pursuant to **Federal Rule of Civil Procedure 12(a)(1)(A)(i)**, Defendant's response was due within twenty-one (21) days of service, making the deadline **June 25, 2025**.
4. As of the date of this motion, **Defendant has failed to plead, respond, or otherwise defend** against the Complaint, and the time permitted by the Federal Rules of Civil Procedure has expired.
5. Upon information and belief, Defendant is **not an infant, incompetent person, or serving in the military** as defined under the Servicemembers Civil Relief Act, 50 U.S.C. § 3931.

WHEREFORE, Plaintiff respectfully requests that the Clerk of this Court **enter default** against **Professional Security Corporation** for failure to respond or otherwise defend as required by law.

Respectfully submitted this 26th day of June, 2025.

/s/ Michelle Brown



Michelle Brown

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Plaintiff, *in propria persona*